



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

August 29, 2008

Mr. Mike Gurley
BFI Waste Systems of North America, Inc.
5105 Morehead Road
Concord, NC 28027

Re: *Request for Alternate Frequency of Assessment Monitoring*
Charlotte Motor Speedway Landfill V, Permit #13-04

Dear Mr. Gurley:

The Solid Waste Section has reviewed the *April 7, 2008 Request for Alternate Frequency of Assessment Monitoring* submitted on behalf of the BFI Waste Systems of North America, Inc. by Herst & Associates, Inc. for the lined Charlotte Motor Speedway Landfill V. The landfill began Assessment Monitoring pursuant to 15A NCAC 13B .1634 for confirmed volatile organic compounds being detected during the October 2004 groundwater sampling event. Appendix II groundwater monitoring has been conducted annually during the April 2005, May 2006, May 2007, and May 2008 groundwater monitoring events. Several organic and inorganic Appendix I and Appendix II constituents have been detected in the groundwater at the facility. Several of the constituents have exceeded either the NC 2L Groundwater Standards or the NC Groundwater Protection Standards, however, all concentrations are statistically below their approved Standards. As a result, the facility has continued assessment monitoring pursuant to 15A NCAC 13B .1634(f). The groundwater impacts detected at the facility appear to be attributable to landfill gas based upon additional parameters collected and repairs made to the landfill gas system.

A request was provided to the Solid Waste Section to modify the groundwater monitoring frequency for the full suite of Appendix II constituents to every three years instead of once a year. Pursuant to 15A NCAC 13B .1634(c), "The Division may specify an appropriate alternate frequency for repeated sampling and analysis for the full set of Appendix II constituents required by Rule .1634(b), during the active life and post-closure care of the unit considering the following factors:

- (1) Lithology of the aquifer and unsaturated zone;
- (2) Hydraulic conductivity of the aquifer and unsaturated zone;
- (3) Ground-water flow rates;
- (4) Minimum distance of travel;
- (5) Resource value of the aquifer; and
- (6) Nature, fate, and transport of any detected constituents."

Based upon the above site specific factors and the unknown risk to public health and the environment, the request to conduct Appendix II monitoring every three years is not approved at this time. However, the Solid Waste Section would reconsider the request if the following concerns are addressed: (1) the elevated groundwater concentrations are delineated horizontally and vertically; (2) determine if Rocky River is the groundwater discharge; (3) even though public water appears to be available, conduct a well and receptor survey within 1,500 feet from the edge of waste to assess any public

health and environmental risks; and (4) determine if new compliance groundwater wells are warranted since the groundwater wells currently being used for compliance purposes appear to be close to the edge of waste.

Please call me at (919) 508-8500 if you have any questions or concerns regarding this letter.

Sincerely,



Jaclynne Drummond
Hydrogeologist
Environmental Compliance
Solid Waste Section

cc: Steve Jett, Herst & Associates
Mark Poindexter, Field Operations Supervisor
Deb Aja, Western District Supervisor
Teresa Bradford, Environmental Specialist
Solid Waste Central Files